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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	2:12-cr-00066-GMN-CWH
)	
Plaintiff,)	
)	STIPULATION FOR PROTECTIVE ORDER
vs.)	
)	
EARL GROSS,)	
)	
Defendant.)	
)	

IT IS HEREBY STIPULATED AND AGREED between the parties, Daniel G. Bogden, United States Attorney for the District of Nevada, and Trial Attorney Brian Young, counsel for the United States, and Dominic Gentile, counsel for defendant Earl Gross, that this Court issue an Order protecting from disclosure to the public any discovery documents containing the personal identifying information such as social security numbers, drivers license numbers, dates of birth, bank account numbers, bank records, or addresses of participants, witnesses and victims in this case. Such documents shall be referred to hereinafter as "Protected Documents." The parties state as follows:

1 1. Protected Documents which will be used by the government in its case in chief include
2 personal identifiers, including social security numbers, drivers license numbers, dates of birth, bank
3 account numbers, bank records, and addresses of participants, witnesses, and victims in this case.

4 2. Discovery in this case is voluminous and includes more than eight gigabytes of
5 electronically stored information. Many of these documents include personal identifiers. Redacting
6 the personal identifiers of participants, witnesses, and victims would prevent the timely disclosure of
7 discovery to defendants.

8 3. The United States agrees to provide Protected Documents without redacting the
9 personal identifiers of participants, witnesses, and victims.

10 4. Access to Protected Documents will be restricted to persons authorized by the Court,
11 namely defendant, attorneys of record and attorneys' paralegals, investigators, experts, and secretaries
12 employed by the attorneys of record and performing on behalf of defendant.

13 5. The following restrictions will be placed on defendant, defendant's attorneys and the
14 above-designated individuals unless and until further ordered by the Court. Defendant, defendant's
15 attorneys and the above-designated individuals shall not:

16 a. make copies for, or allow copies of any kind to be made by any other person of
17 Protected Documents;

18 b. allow any other person to read Protected Documents; and

19 c. use Protected Documents for any other purpose other than preparing to defend
20 against the charges in the Indictment or any superseding indictment arising out of this case.

21 6. Defendant's attorneys shall inform any person to whom disclosure may be made
22 pursuant to this order of the existence and terms of this Court's order.

23 7. The requested restrictions shall not restrict the use or introduction as evidence of
24 discovery documents containing personal identifying information such as social security numbers,
25 drivers license numbers, dates of birth, and addresses during the trial of this matter.
26

8. Upon conclusion of this action, defendant's attorneys shall return to government counsel
or destroy and certify to government counsel the destruction of all discovery documents containing
personal identifying information such as social security numbers, drivers license numbers, dates of
birth, and addresses within a reasonable time, not to exceed thirty days after the last appeal is final.

DANIEL G. BOGDEN
United States Attorney

/s/ Brian R. Young
BRIAN R. YOUNG
Trial Attorney

3/7/2012
DATE


/s/ Dominic Gentile
DOMINIC GENTILE
Counsel for defendant Earl Gross

3/7/2012
DATE 3/13/12

ORDER

IT IS SO ORDERED this 19th day of March 2012.


UNITED STATES MAGISTRATE JUDGE